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13 **UNITED STATES BANKRUPTCY COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **SAN FRANCISCO DIVISION**

16

17 In re

18 ANTHONY SCOTT LEVANDOWSKI,

19 Debtor.

20 ANTHONY SCOTT LEVANDOWSKI,

21 Plaintiff,

22 UBER TECHNOLOGIES, INC.,

23 Defendant.

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Bankruptcy Case No. 20-30242 (HLB)

Chapter 11

Hon. Hannah L. Blumenstiel

Adv. Proceeding No. 20-03050_

**GOOGLE LLC'S NOTICE OF MOTION
AND MOTION TO INTERVENE**

Date: September 3, 2020

Time: 2:00 p.m. (PST)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
450 Golden Gate Ave.
Courtroom 19, 16th Floor
San Francisco, CA 94102

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 1. **PLEASE TAKE NOTICE** that on September 3, 2020 at 2:00 p.m., or as soon as
3 thereafter as counsel may be heard, in Courtroom 19 at the United States Bankruptcy Court for the
4 Northern District of California in San Francisco, located at 450 Golden Gate Avenue, 16th Floor,
5 San Francisco, CA 94102 before the Honorable Hannah L. Blumenstiel, Google LLC (“Google”)
6 will and hereby does move this Court for an order granting Google LLC’s Motion to Intervene. A
7 proposed order is attached as Exhibit A.

8 2. Debtor Anthony Levandowski (the “Debtor”) filed this proceeding, No. 20-03050,
9 objecting to Uber Technologies, Inc.’s (“Uber”) proof of claim and seeking declaratory relief,
10 specific performance and damages against Uber. This proceeding primarily concerns the
11 enforceability of an Indemnification Agreement that Uber and the Debtor signed in April 2016, by
12 which Uber agreed to indemnify the Debtor against claims brought by his former employer,
13 Google. *See* Dkt. No. 1 (Compl.), Ex. A. Google holds a \$179 million judgment against the
14 Debtor that is covered by this indemnity, and now moves for an order permitting it to intervene in
15 this proceeding so that it can participate and be heard on issues surrounding this Uber indemnity
16 and other related issues that are core to this bankruptcy.

17 3. This Motion is based upon this Notice of Motion, the attached Memorandum of
18 Points and Authorities in support thereof, the Declaration of Alexander Gorin filed
19 contemporaneously herewith, all papers and pleadings from this case on file with the Court, all
20 other matters of which the Court may take judicial notice, any further evidence or argument
21 offered to the Court at the hearing on this Motion, and any other matters that the Court may
22 consider.

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1 Dated: July 31, 2020

By: John W. Berry

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